

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

Nadire Atas

22-CV-00853-LTS

Plaintiff

JURY TRIAL

against

The New York Times Company d/b/a The New York Times

Ellen Pollock

Lily Meier

Kashmir Hill .

THE DAILY PODCAST,

Michael Barbaro

Dr. Todd Essig

John Does 1 through 20,

XYZ Corporations 1 through 10,

Defendants

OPENING

INTRODUCTION - NATURE OF THE ACTION

1. Plaintiff Nadire Atas (“ATAS”) , brings the following Complaint against Defendants

The New York Times Company d/b/a The New York Times (“The New York Times” or

“The Times”), reporters Kashmir Hill, Aaron Krolik , Ellen Pollock , Lily Meier , THE DAILY PODCAST, Michael Barbaro , Dr. Todd Essig, John Does 1 through 10, XYZ Corporations 1 through 10, and in support of her Complaint, avers as follows:

2. The Plaintiff Ms. Atas brings this action to hold the Defendants accountable for defaming her by publishing without privilege false statements about her in two stories in the New York Times and in social media accounts and defaming her with slanderous statements made without privilege about her in Podcast and radio broadcasts that were published and spoken with knowledge of falsity or with disregard for the truth
3. This defamation action arises out of the publication of two false and defamatory news stories published by Defendant Kashmir Hill, as the credited author, a tech reporter for the New York Times, and published in both the online and print versions of The Times.
4. The first story was published on The New York Times website on January 30, 2021 with the headline, “ A VAST WEB OF VENGEANCE A HUNT FOR THE SOURCE OF VICIOUS LIES UNCOVERS THE UNIMAGINABLE: ” and an abbreviated form was published in print on January 31, 2021 with the headline “ ATTACKED BY A ‘SUPERSPREADER’ OF ONLINE SMEARS “
5. The second story was published on The New York Times website on February 10, 2021 with the headline, “ WOMAN ACCUSED OF DEFAMING DOZENS ONLINE IS ARRESTED ” and a form was published in print on February 11, 2021 with the headline “CANADIAN WOMAN CITED IN ONLINE ATTACKS IS ARRESTED”

6. The New York Times website on February 2, 2021 updated the story “ A VAST WEB OF VENGEANCE A HUNT FOR THE SOURCE OF VICIOUS LIES UNCOVERS THE UNIMAGINABLE: ” and made it available download Audm for iPhone or Android.
7. Defendant Kashmir Hill published on her personal Twitter and LinkedIn Accounts with excerpts from the stories and her additional personal statements and linked to the NYT website <https://www.nytimes.com/2021/01/30/technology/change-my-google-results.html> and <https://www.nytimes.com/2021/02/10/technology/nadire-atas-arrest.html>
8. Defendant The New York Times published on the Twitter and Facebook Accounts of the New York Times with excerpts from the two stories and linked to the NYT website <https://www.nytimes.com/2021/01/30/technology/change-my-google-results.html> and <https://www.nytimes.com/2021/02/10/technology/nadire-atas-arrest.html>
9. <https://www.nytimes.com/2021/02/10/technology/nadire-atas-arrest.html>
10. Defendant Kashmir Hill appeared on The Daily with Michael Barbaro and Luc Groleau and slandered the Plaintiff Ms. Atas with false and defamatory statements
11. Defendant Kashmir Hill appeared on CBC Radio's The Current with Matt Galloway with Christina Wallis and slandered Ms. Atas with false and defamatory statements
12. Defendant Dr. Todd Essig made statements published in the story “ A VAST WEB OF VENGEANCE A HUNT FOR THE SOURCE OF VICIOUS LIES UNCOVERS THE UNIMAGINABLE: ” implying that Ms Atas is mentally ill despite never having examined her and publicly lauded Atas’ arrest following the NYT publication on his Twitter account
13. Lily Meier entered into a corrupt agreement to defame Ms Atas
14. The Defendants published a story for the New York Times about Ms Atas to publicly smear her on the world stage with false statements that she is a mentally ill Toronto

woman and her mental illness has caused her to go on a 25 year campaign of vengeance by anonymously posting thousands of false statements on the internet about many hundreds of people

15. The Defendants published a story for the New York Times that Ms Atas published internet posts about the Defendants Kashmir Hill, her husband and Ellen Pollak
16. Ms Atas brings this action to vindicate her rights under civil law, to restore her reputation and to establish Defendants' liability for the harm that they have caused to Ms Atas' reputation due to the reckless publication of these false and defamatory statements.
17. The Defendants' grandiose plans for a documentary to raise their profile as journalist
18. Acting as useful idiots for litigants in a foreign jurisdiction, the courts in Toronto, Ontario Canada
19. Ms Atas brings this action to vindicate her rights under civil law, to restore her reputation and to establish Defendants' liability for the harm that they have caused to Ms Atas' reputation due to the reckless publication of these false and defamatory statements.
20. Ms Atas seeks an award of presumed and compensatory damages for the publication of this false story and, given the willful and malicious nature of Defendants' conduct in knowingly publishing falsehoods out of a desire to cause harm to Ms Atas
21. Plaintiff also seek an award of punitive damages.

THE PARTIES

22. Plaintiff Nadire Atas ("ATAS"), is an individual . She is a natural person

over the age of eighteen, a private citizen of Canada and domiciled in Toronto Ontario Canada .

23. Defendant The New York Times Company d/b/a The New York Times (THE TIMES) is a publicly traded New York corporation with its principal place of business at The New York Times Building, 620 Eighth Avenue, New York, New York. It publishes The New York Times, which has the third largest circulation of any U.S.-based newspaper.

24. Defendant Ellen Pollock (POLLOCK) is an editor of The New York Times. She is a citizen of the State of New York and is domiciled in New York State. She is a natural person over the age of eighteen,

25. Defendant Lily Meier (MEIER) is a daughter of Defendant Ellen Pollock. She is a citizen of the State of New York and is domiciled in New York State . She is a natural person over the age of eighteen, and is, and/or at all relevant times was, an employee, officer, director and/or agent of The York Times as an editor of The New York Times.

26. Defendant Kashmir Hill (HILL) is the credited author of “ A Vast Web of Vengeance” and "Woman Accused of Defaming Dozens Online Is Arrested". She is a citizen of the State of New York and is domiciled in New York State . She is a natural person over the age of eighteen, and is, and/or at all relevant times was, an employee, officer, director and/or agent of The York Times as a reporter of The New York Times.

27. Defendant THE DAILY PODCAST, (THE DAILY) is a daily news podcast and radio show owned by the American newspaper The New York Times.

Hosted by Times political journalist Michael Barbaro, its episodes are based on the Times' reporting of the day with interviews of journalists from the New York Times.

28. Defendant Michael Barbaro (BARBARO) is a political journalist for the Times and is the host of the THE DAILY PODCAST .He is a citizen of the State of New York and is domiciled in New York State. He is a natural person over the age of eighteen, and is, and/or at all relevant times was, an employee, officer, director and/or agent of The York Times as a political journalist for the Times and is the host of the THE DAILY PODCAST
29. Dr. Todd Essig (ESSIG) is a clinical psychologist and psychoanalyst . He is a citizen of the State of New York and is domiciled in New York State. He is a natural person over the age of eighteen,
30. At all times relevant hereto, the defendants, John Does 1 through 20, are fictitious names used to identify those individuals whose names are presently unknown to Plaintiff including, but not limited to , employed and not employed by The New York Times, publishers, editors, journalists, reporters, writers, videographers, advisors, consultants, officers, managers, owners, principals, employees, agents and/or other duly authorized individuals who caused or contributed to the causes, incidents or events for which Plaintiff seeks damages, and/or are vicariously or otherwise liable for the acts, commissions, or other culpable conduct of those who did cause or contribute to the causes, incidents or events alleged herein.
31. At all times relevant hereto, the defendants, XYZ Corporations 1 through 10,

are corporate entities presently unidentifiable to Plaintiff, including, but not limited to, employers or employees of any of the Defendants, media outlets, news stations, publication companies, and/or other duly authorized corporate entities or affiliates who caused or contributed to the incident or incidents for which Plaintiff seeks damages, and/or are vicariously and/or otherwise liable for the acts, commissions, or other culpable conduct of those who did cause or contribute to the causes, incidents, or events alleged herein.

VENUE AND JURISDICTION

32. This Court has subject-matter jurisdiction over this matter pursuant to 28 U.S.C. § 1332(a).
33. There exists complete diversity of citizenship between Plaintiff and the Defendants
34. The amount in controversy greatly exceeds Seventy-Five Thousand Dollars (\$75,000.00), exclusive of interests, costs, and attorneys' fees, as required to sustain subject-matter jurisdiction in this Court.
35. This Court has personal jurisdiction over Defendants pursuant to New York Civil Practice Law and Rules § 301 ("CPLR") because The Times has offices and its principal place of business in New York, New York, and the causes of action alleged herein arise out of The Times' activities in New York, New York. This Court also has personal

jurisdiction over The Times under CPLR § 302(a) because this action arises out of the Defendants' transaction of business in New York, New York.

36. Venue properly lies within this judicial district pursuant to 28 U.S.C. § 1391 because the Defendants reside in this judicial district and a substantial portion of the events giving rise to the claims asserted in this action occurred in this judicial district

FACTUAL ALLEGATIONS

37. Ms Atas is still embroiled with the same litigants in ongoing proceedings in Civil Court in Toronto, Ontario, Canada
38. The named and unnamed sources for the “ A VAST WEB OF VENGEANCE “ and “ WOMAN ACCUSED OF DEFAMING DOZENS ONLINE IS ARRESTED ” are the the same litigants in ongoing proceedings in Civil Court in Toronto, Ontario, Canada And related people piggy backing onto the ongoing proceedings
39. Since 2017, the same litigants in ongoing proceedings in Court in Toronto, Ontario, Canada have also been pursuing criminal charges against Ms Atas
40. The same litigants in ongoing proceedings in Court in Toronto, Ontario, Canada have also been pursuing contempt proceedings within the civil proceedings since 2016 and 2018 against Ms Atas seeking sanctions of incarceration
41. The same litigants and others who are not litigants in the ongoing proceedings in Court in Toronto, Ontario, Canada entered into a corrupt agreement with Kashmir Hill to publish and publicly smear her on the world stage with false statements that she is a

mentally ill Toronto woman and her mental illness has caused her to go on a 25 year campaign of vengeance by anonymously posting thousands of false statements on the internet about many hundreds of people

42. The same litigants and others who are not litigants in the ongoing proceedings in Court in Toronto, Ontario, Canada entered into a corrupt agreement with Kashmir Hill to ascertain that Ms Atas has electronic devices in her possession
43. The same litigants and others who are not litigants in the ongoing proceedings in Court in Toronto, Ontario, Canada simultaneous to the NYT story pursued criminal charges against Ms Atas, first with the Rogers , Arkansas Police Services on the same set of facts as in the Civil Courts in in Toronto, Ontario, Canada
44. The same litigants and others who are not litigants in the ongoing proceedings in Court in Toronto, Ontario, Canada once again pursued criminal charges against Ms Atas with the Toronto Police Services to have Ms Atas criminally charged under the Criminal Code on the same set of facts as in the Civil Courts in in Toronto, Ontario, Canada
45. In February 8, 2018, the Toronto Police Services closed the complaint due to lack of evidence .
46. The Plaintiff Ms Atas was arrested February 9, 2021, by the Toronto Police Services in a no knock entry into her home and her electronic devices, a computer and cell phone were seized.
47. Ms Atas was criminally charged under the Criminal Code of Canada on behalf of the following , many being named and unnamed sources in the NYT story “A Vast Web of Vengeance” published by the New York Times and sources for Kashmir Hill
 - a. Gary Caplan

- b. Christina Wallis
- c. Guy Babcock
- d. Luc Groleau
- e. Matthew Cameron
- f. Matthew Hefler
- g. Natalie Wallis
- h. Michael Borysenko
- i. Dr Joseph Caplan
- j. Brad Bartja
- k. Jon Stancer

48. The Plaintiff Ms Atas was again arrested on April 7, 2021 in a no knock entry into her home

- a. Lily Meier
- b. John Babcock
- c. Sammy Stancer
- d. Alana Stancer

49. A NYT reporter attended Ms Atas' bail hearing on April 23, 2021 and on April 24, 2021 provided the Attorney General with a link to the NYT story <https://www.nytimes.com/interactive/2021/04/24/technology/online-slander-websites.html> to over see the prosecution on behalf of Lily Meier , daughter of the editor of the New York Times , Defendant Ellen Pollock

50 The Toronto Police obtained a search warrant in late September 2021 to search Ms Atas' electronic devices and found no evidence of internet posts

51. All the Criminal Charges against Ms Atas were withdrawn by the Attorney General on December 7, 2021

52. Prior to this, in 2017 , the same litigants in ongoing proceedings in Court in Toronto, Ontario, Canada had filed complaint with the Toronto Police Services against Nadire Atas on the same facts and issues as in the contempt proceedings within civil proceedings. The Toronto Police Services closed the complaint on February 8, 2018.

53. Despite the closure of the complaint by the Toronto Police Services on February 8, 2018, the litigants then filed more defamation actions against Ms Atas and continued to pursue Criminal Charges against Ms Atas

54. On March 30, 2018, the litigants filed yet another defamation action against Nadire Atas seeking in the prayer for relief inter alia referral to the Attorney General for Ms Atas to be charged under the Criminal Code of Canada and for Ms Atas to be ordered to undergo a psychiatric examination and to be apprehended and held under the Mental Health Act (forced commitment to a metal health facility)

55. On November 2, 2018, the litigants filed yet another defamation action against Nadire Atas seeking the same in the prayer for relief and premised entirely on the previous defamation actions

56. The litigants were unable to lay private criminal charges against Ms Atas

57. The Civil Courts in Canada do not have the jurisdiction to make orders for referrals for Criminal Charges and psychiatric examinations under the Mental Health Act and involuntary commitment .

58. The litigants and non litigants then entered into a corrupt agreement with the New York Times reporter Kashmir Hill to publish a story about Ms Atas that she is mentally ill and that her mental illness is the cause of her conduct in publishing internet posts

59. The litigants and non litigants filed elaborate and colorful presentations to the Toronto Police Services in December 2020 and January 6 , 2021 on the same of facts and documents as in the civil and contempt proceedings in the Civil Court asking the Toronto Police Services to investigate and have Ms Atas arrested and charged under the Criminal Code

60. The New York Times published “ A Vast Web of Vengeance “ on January 30, 2021 that included statements that were the same as the statements that the litigants and non litigants had included in their filed presentations to the Toronto Police Services in December 2020 and January 6 , 2021

70. The first conversation on October 26, 2020 between Kashmir Hill and Ms Atas was fortunately recorded on Kashmir Hill’s aggressive insistence that Ms Atas consent to the recording.

71. During the first conversation between Kashmir Hill and Ms Atas, Kashmir Hill was fixated on Ms Atas electronic devices , even deriding Ms Atas that she had been told that Ms Atas does not own a computer or phone and uses libraries and internet cafes

72. Kashmir Hill ascertained that Ms Atas did own a phone and computer and shared this information with the sources for her story “ A Vast Web of Vengeance”

73. The litigants and non litigants then included the existence of electronic devices in their elaborate and colorful presentations to the Toronto Police Services in December 2020 and January 6 , 2021

74. There was no evidence that Ms Atas is the author of the internet posts except for the 2016 statement of claim that Ms Atas had admitted to as being factual and true

75. The litigants and non litigants pursued Ms Atas' electronic devices with the expectation that Ms Atas' electronic devices would contain evidence of internet posts

76. On February 8, 2021, the litigants and non litigants commenced an ex-parte motion in Toronto, Ontario, Canada for contempt and anton piller like order to obtain order (civil search warrant rarely granted) to enter Ms Atas' home and take possession of her electronic devices and papers

77. On February 8, 2021, the litigants in in Toronto, Ontario, Canada also surreptitiously filed a document consisting of 2514 pages of URLs with the headline " Schedule B List of Internet Posts Attributed to Nadire Atas ", dated February 8, 2021 , with the URLs dated prior to November 2019 and subsequent to November 2019 and continuing all the way through 2020 and to January 28, 2021 , hoping to have Justice Corbett include this document in the court file.

78. For the first time, the document consisting of 2514 pages included URLs of internet posts about Matthew Hefler (source to NYT " A Vast Web Of Vengeance ") and Matthew Cameron and Jennifer Hefler. Their names had not been before the Court and were obviously not in Justice Corbett's Judgment linked as a PDF to the NYT story at

<https://int.nyt.com/data/documenttools/caplan-v-atas/36240cac847e8e4e/full.pdf>

79. Justice Corbett , in his August 5 , 2021 decision reporting at Caplan v. Atas, 2021 ONSC 5390 (CanLII) in Paragraph 23, made order that he makes no finding of authorship

80. On August 6, 2021 , Gary Caplan wrote email to Justice Corbett complaining about his August 5 , 2021 decision that makes not finding of authorship.

81. The litigants in Toronto, Ontario, Canada then pursued the contents of Ms Atas' electronic devices in the police custody

82. In August 2021, the litigants commenced yet another misguided motion in Toronto, Ontario, Canada for anton piller like order (civil search warrant rarely granted) to obtain copies of the hard drives of Ms Atas' electronic devices in the custody of the Toronto Police Services and evidence in active prosecution

83. The Attorney General of Ontario obviously opposed and even challenged Justice Corbett's authority as a Civil Court Judge to even hear such a motion

84. Ms Atas counsel obviously opposed and even questioned Justice Corbett's absurd Judgment dated January 28, 2021 , Para 228 vesting title to the postings in moving parties , with ancillary orders enabling them to take steps to have the content removed. Justice Corbett's Judgment linked as a PDF to the NYT story at

<https://int.nyt.com/data/documenttools/caplan-v-atas/36240cac847e8e4e/full.pdf>

85. Gary Caplan withdrew motion on the day the motion was to be heard

THE NEW YORK TIMES ARTICLES

86. It is the stuff of tabloids cloaked as investigative journalism under the umbrella of a well known newspaper , The New York Times

A Vast Web of Vengeance

49. The following statements are false and defamatory



chris pollard

Scammer / Guy Sanderson Babcock
Oxford masquerading as an IT consultant
ISLINGTON, LONDON, ENGLAND, N1
operating as QUARTERMAIN & COMPANY
of his age if you ever meet this idiot.
Rip Off / Quartermain & Company Ltd
Sanderson Babcock for software development

Mr. Babcock discovered Nadire Atas's involvement when he found an old photo of her accompanying a slanderous comment on a blog post.

Mr. Babcock stared at the photo in shock. He hadn't seen it in decades, but he recognized it instantly. The woman's name was Nadire Atas; this was her official work portrait from 1990, when she worked in a Re/Max real estate office the Babcock family owned outside Toronto. She had initially been a star employee, but her performance deteriorated, and in 1993 Mr. Babcock's father had fired her. Afterward, she had threatened his father, according to an affidavit filed in a Canadian court.

87. This is false .

88. Ms Atas is not the author

89. internet post does not exist on the internet

90. Ms Atas did not and could not remove a publication from someone else's site

91. Ms Atas commenced work as a independent contractor in 1991 with Remax on the Mountain Realty Inc. This was NOT her official work portrait from 1990. The image of Nadire Atas was taken in 1993, and used for marketing purposes for Remax Advantage Realty Inc. AFTER she was no longer affiliated with the Babcock's office Remax on the Mountain Realty Inc.

92. January 1993 was an exceptional earning month for Ms Atas. Ms Atas moved to Remax Advantage Realty Inc with 15 other realtors previously from Remax on the Mountain Realty Inc. The sudden exodus of realtors from Remax on the Mountain Realty Inc to Remax Advantage and other brokerages and the whirling gossip surrounding the Babcocks caused financial and reputational hardship for the Babcocks and their franchise office Remax on the Mountain Realty Inc. Realtors would not sign up as independent contractors. Remax offices are independently owned franchises and their revenue comes from rental of office space to independent contractor realtors and for 5% of realtor's commissions paid to the brokerage and other franchise fees . The Babcocks atrocious personal and business conduct in addition to gossip and non-payment of commissions and billing caused the realtor exodus . Remax on the Mountain Realty Inc went out of business in 1997 . This was a family business intended to be continued by the younger Babcock generation. To save face, John Babcock called the office closure a retirement . Guy Babcock called this closure a sale . It was not a sale . The name Remax on the Mountain Realty Inc was toxic within the industry and ceased to exist in 1997 with the closure . No one wanted to be affiliated with the name Remax on the Mountain . No one wanted to buy the name . The Babcocks were pariahs. Guy Babcock himself moved to another

Remax franchise , Remax Escarpment Realty Inc. for many years upon the closure of Remax on the Mountain Realty Inc. Guy Babcock was often referred to as a pedophile due to his conduct in the office and still living with his parents.

93. Ms Atas has never threatened Guy Babcock's father John Babcock. This is false and defamatory

94. John Babcock has never made any claims or complaints of Ms Atas uttering threats to him

95. The Police Services in Canada have never contacted Ms Atas about allegations of threats to John Babcock

96. Ms Atas has never been charged with uttering threats to John Babcock

97. Ms Atas has never been contacted by any regulatory body for Realtors for uttering threats to John Babcock

98. Uttering threats to someone in Canada is a criminal offense under s.264.1(1) of Criminal Code of Canada and carries a jail term

99. The following statement is false

When his mother died in 1999, the family had received vulgar, anonymous letters celebrating her death. A neighbor received a typed letter stating that Mr. Babcock's father "has been seen roaming the neighbourhood late at night and masturbating behind the bushes." The Babcocks had suspected Ms. Atas, who was the only person who had ever threatened them. (Ms. Atas denied making threats or writing the letters.)

Decades later, it appeared that she was still harboring her grudge — and had updated her methods for the digital age.

100. Ms Atas has never sent any such letters

101 The neighbours have never made any claims or reports to the authorities of receiving letter

102. John Babcock have never made any claims or reports to the authorities of receiving letters

103. The Police Services in Canada have never contacted Ms Atas about allegations for sending any such letters

104. Ms Atas has never been charged with sending any such letters

105. Ms Atas has never been contacted by any regulatory body for Realtors for sending any such letters

106. This is a Criminal Code of Canada if false.

107. This is false

Mr. Babcock searched Ms. Atas's name online and found a blog written by a Canadian lawyer, Christina Wallis. It was the first in a trail of clues that would eventually reveal the breadth of Ms. Atas's online campaign.

"A lie can travel halfway around the world while the truth is putting on its shoes," wrote Ms. Wallis, borrowing a quote often attributed to Mark Twain. She described how Ms. Atas had waged an online campaign against her, her colleagues and her family, including branding them pedophiles.

Mr. Babcock got goose bumps.

His brother-in-law, Mr. Groleau, contacted Ms. Wallis. She had represented a bank that foreclosed on two properties Ms. Atas owned in the early 2000s. Dozens of people had come under online attack: employees of the bank, lawyers who represented the bank, lawyers who

represented those lawyers, relatives of those people and on and on. The attacks seemed engineered to perform well in search engines, and they included the victims' names, addresses, contact information and employers. (Ms. Atas denies being the author of many of these posts.)

108. Ms Wallis has been a Plaintiff in contempt motions commenced in 2016 on the same set of facts and evidence

109. Ms Wallis was a complainant to the Toronto Police Services in February 9, 2021 and the criminal charges against Ms Atas were withdrawn December 7, 2021 for no reasonable prospect of conviction

110. Plaintiff Ms. Atas' electronic devices (computer and cell phone) were seized by the Toronto Police Services upon her arrest on February 9, 2021 and following a thorough investigation and a search of the Plaintiff's electronic devices by the Toronto Police Services by search warrant and finding no evidence of internet postings , the Attorney General of Ontario withdrew all the charges under the Criminal Code of Canada against the Plaintiff Ms Atas on December 7, 2021

111. The Toronto Police Services have conducted a thorough investigation for any internet posts related to Ms. Atas dating back to January 1, 2000 to February 9, 2021 and all criminal charges were withdrawn December 7, 2021 for no reasonable prospect of conviction

112. This statement is false

A relative of one lawyer said she spent months applying for jobs in 2019 without getting any offers. The woman, who asked not to be named because she feared Ms. Atas, said her bills piled up. She worried she might lose her home.

Then she decided to apply for jobs using her maiden name, under which she hadn't been attacked. She quickly lined up three interviews and two offers.

113. Unnamed source and gratuitous statement

114, The Toronto Police Services have conducted a thorough investigation for any internet posts related to Ms. Atas dating back to January 1, 2000 to February 9, 2021 and all criminal charges were withdrawn December 7, 2021 for no reasonable prospect of conviction

115. The false and defamatory statements in the New York Times articles have been debunked and proven to be false by a thorough investigation by the Toronto Police Services .

116. This is a false statement

The victims in the Atas case live in Canada, Britain and the United States. In June 2020, Matthew Hefler, 32, the brother-in-law of a colleague of Ms. Wallis, became one of the latest targets. Mr. Hefler, who lives in Nova Scotia, is a historian who recently completed his Ph.D. in war studies. He is trying to find a teaching job. But anyone who searches for him online will encounter posts and images tarring him as a pedophile and "pervert freak."

Until recently, Mr. Hefler had never heard of Ms. Atas. He had no clue why she was attacking him. "You discover that someone you've never met, across the country, is running a one-man troll farm against you," Mr. Hefler said. "It's a nightmare scenario."

117. Matt Hefler was a complainant to the Toronto Police Services in February 9, 2021 and the criminal charges against Ms Atas were withdrawn December 7, 2021 for no reasonable prospect of conviction

118. On August 5, 2021, Justice Corbett made Order explicitly that he makes no finding of authorship of internet posts AFTER November 13, 2019 and prior

119. This statement is false and defamatory

Ms. Atas claims that she didn't write those posts and that her enemies fabricated the case against her. But the evidence suggests otherwise. For example, most of the attacks were posted anonymously, but like Mr. Babcock, I discovered a "paedophile" accusation against him on an old WordPress blog where she was listed as the author. When I asked her about it, Ms. Atas denied writing it. A few days later, the years-old comment had been deleted.

120. This identical statement was repeated in the presentations to the Toronto Police dated January 6, 2021, three weeks BEFORE the publication of "A Vast Web of Vengeance" on January 30, 2021

121. Plaintiff Ms. Atas' electronic devices (computer and cell phone) were seized by the Toronto Police Services upon her arrest on February 9, 2021 and following a thorough investigation and a search of the Plaintiff's electronic devices by the Toronto Police Services by search warrant and finding no evidence of internet postings , the Attorney General of Ontario

withdrew all the charges under the Criminal Code of Canada against the Plaintiff Ms Atas on December 7, 2021

122. The Toronto Police Services have conducted a thorough investigation for any internet posts related to Ms. Atas dating back to January 1, 2000 to February 9, 2021 and all criminal charges were withdrawn December 7, 2021 for no reasonable prospect of conviction

123. Guy Babcock was a complainant to the Toronto Police Services in February 9, 2021 and the criminal charges against Ms Atas were withdrawn December 7, 2021 for no reasonable prospect of conviction

124. Ms Atas has never used the word “enemies”. This is choice of language to diminish Ms Atas as a paranoid psychotic who perceives people as enemies.

125. This is a false and defamatory. Ms Atas’ life was not falling apart,

126. This is a Smear Job. Kashmir Hill had entered into a corrupt agreement with her sources to portray Ms. Atas as a hereditarily psychotic

But her life was beginning to fall apart. In October 1992, her brother, then 23, called the police saying that their mother “was involved in a devil-worshipping cult,” according to an article in a local newspaper, The Spectator. Days later, Ms. Atas’s brother shot his mother in the hand. (A judge ruled that Ms. Atas’s brother was not guilty by reason of insanity, The Spectator reported. I couldn’t reach him for comment.)

This is false and defamatory

127. A few months after the shooting, the Babcocks fired Ms. Atas. She told me she chose to leave on her own.

128. Ms. Atas signed with Remax Advantage on the same day she left Remax on the Mountain . Ms Atas had had her best month in January 1993 and continued to flourish at Remax Advantage

129. This is False and defamatory

Ms. Atas vanished from the public record for the next nine years. But around 2001, according to Ontario court filings, she was arrested and charged with assault and resisting arrest. The charges were ultimately withdrawn, but a peace bond, Canada's equivalent of a restraining order, was issued against her.

130. A peace bond is not Canada's equivalent of a restraining order. This was an incident involving an aggressive security guard in a shopping mall over Ms Atas small bijon frise dog as dogs were not allowed.

131. This is false and defamatory

Ms. Atas moved into one of the apartments in her Toronto building, which was the subject of complaints from tenants. One, who moved in during 2008, found their new apartment filthy. When they opened the refrigerator, the tenant said in an interview, a "waterfall of maggots" poured out.

Ms. Atas made the building's residents feel unsafe. "She has harassed us repeatedly, forcing us to finally call the police on her," according to an email from a tenant that was filed in court. Ms. Atas was charged with assaulting another tenant

132. This is false and defamatory

Ms. Atas allegedly resorted to revenge. In 2009, Matt Cameron, a junior lawyer working with Ms. Wallis on the Atas case, started getting calls and emails at the office from men interested in meeting for sex. Someone impersonating him had responded by email to raunchy Craigslist ads and given his contact information. (Metadata from those emails, filed in court, pointed to Ms. Atas's involvement.)

133. This is false and defamatory, On January 27, 2021, Ms Atas sent Kashmir Hill and Ellen Pollak a transcript of the hearing dated September 11, 2015 when this issue was alleged and Justice Corbett rejected the document that Christina Wallis was calling Meta Data

134. This is false and defamatory .

A relative of Ms. Atas told me that family members had repeatedly tried and failed to get her help for mental health problems.

135. This is false and defamatory. Kashmir Hill fabricated that she had spoken with a relative of Ms Atas as no one has ever tried and failed to get her help for mental health problems as it is not necessary. Ms Atas is an adult and capable of taking care of her own health

136. This is false and defamatory

And then, around 2015, she came across a new weapon. She started attacking her perceived enemies online on the Ripoff Report and elsewhere. She called Ms. Wallis and her colleagues "incompetent," "fraudsters" and "jackasses." (Ms. Atas acknowledged she was behind these posts.) Someone created multiple WordPress blogs to attack the lawyers.

137. Everything in the 2016 statement of claim is factual and true

138. This is false and defamatory

Gary M. Caplan is the lawyer for Ms. Wallis, Mr. Babcock and 43 others who have sued Ms. Atas for defamation. One of those plaintiffs is Mr. Caplan's brother, who came under attack after Mr. Caplan got involved in the case. There are another 100 or so people who have been targeted but aren't plaintiffs. Over the last two years, there have been more than 12,000 defamatory posts, according to software that Mr. Babcock's brother-in-law created to track new posts.

139. Gary Caplan, Dr Joseph Caplan and Luc Groleau were both complainants to the Toronto Police Services in February 9, 2021 and the criminal charges against Ms Atas were withdrawn December 7, 2021 for no reasonable prospect of conviction

140. Ms. Atas' electronic devices (computer and cell phone) were seized by the Toronto Police Services upon her arrest on February 9, 2021 and following a thorough investigation and a search of the Plaintiff's electronic devices by the Toronto Police Services by search warrant and finding no evidence of internet postings , the Attorney General of Ontario withdrew all the charges under the Criminal Code of Canada against the Plaintiff Ms Atas on December 7, 2021

141. The Toronto Police Services have conducted a thorough investigation for any internet posts related to Ms. Atas dating back to January 1, 2000 to February 9, 2021 and all criminal charges were withdrawn December 7, 2021 for no reasonable prospect of conviction

142. This is false and defamatory

The next year, Mr. Caplan hired a private investigator to trail Ms. Atas, because she refused to say where she lived or how she accessed the internet. Mr. Caplan wanted that information in order to obtain evidence for his lawsuit.

One evening in June 2018, the investigator followed Ms. Atas as she left court, got on a subway and then boarded a bus.

At 7:30 p.m., Ms. Atas entered a public library at the University of Toronto. She spent the next few hours at a computer, according to the investigator's written report and photos that he took

surreptitiously. Then she rode a bus to a homeless shelter. (Ms. Atas denied that she stayed in the shelter.)

In response to subpoenas, Pinterest, Facebook and WordPress, the blogging site, had provided Mr. Caplan with metadata about the abusive posts. Some had originated from computers at the University of Toronto. Suddenly, that made sense.

142, Plaintiff Ms. Atas' electronic devices (computer and cell phone) were seized by the Toronto Police Services upon her arrest on February 9, 2021 and following a thorough investigation and a search of the Plaintiff's electronic devices by the Toronto Police Services by search warrant and finding no evidence of internet postings , the Attorney General of Ontario withdrew all the charges under the Criminal Code of Canada against the Plaintiff Ms Atas on December 7, 2021

143. Ms. Atas' electronic devices (computer and cell phone) were seized by the Toronto Police Services upon her arrest on February 9, 2021 and following a thorough investigation and a search of the Plaintiff's electronic devices by the Toronto Police Services by search warrant and finding no evidence of internet postings , the Attorney General of Ontario withdrew all the charges under the Criminal Code of Canada against the Plaintiff Ms Atas on December 7, 2021

144. The Toronto Police Services have conducted a thorough investigation for any internet posts related to Ms. Atas dating back to January 1, 2000 to February 9, 2021 and all criminal charges were withdrawn December 7, 2021 for no reasonable prospect of conviction

145. This is false and defamatory

Early last year, Judge Corbett found Ms. Atas in contempt of court because she had written to another judge, violating the restrictions placed on her as a vexatious litigant. She was sentenced to 74 days in prison. While she was locked up, the online attacks slowed to a trickle. (The fact that they didn't cease altogether might have been because some complaint sites take content from one another, a pattern of mimicry that can keep attacks flowing.) When she was released in March, they resumed. Ms. Atas told me it wasn't her.

146. Plaintiff Ms. Atas' electronic devices (computer and cell phone) were seized by the Toronto Police Services upon her arrest on February 9, 2021 and following a thorough investigation and a search of the Plaintiff's electronic devices by the Toronto Police Services by search warrant and finding no evidence of internet postings , the Attorney General of Ontario withdrew all the charges under the Criminal Code of Canada against the Plaintiff Ms Atas on December 7, 2021

147. The Toronto Police Services have conducted a thorough investigation for any internet posts related to Ms. Atas dating back to January 1, 2000 to February 9, 2021 and all criminal charges were withdrawn December 7, 2021 for no reasonable prospect of conviction

148. The litigants oncluded this in their presentation to the Toronto Police

False

During an interview with Ms. Atas in November, she grew angry that I planned to write this article. A week later, someone started writing posts about me and my husband on Cheaterbot, BadGirlReports and some of the other sites where Mr. Babcock and others had been targeted. The posts claimed that my husband was a drug addict and that I was a plagiarist who slept with my boss in order to get promoted. Ms. Atas said it wasn't her.

Within a week, there were more than 100 posts about me.

After Ms. Atas talked to my editor, posts appeared about her. Ms. Atas said she hadn't created those, either.

Plaintiff Ms. Atas' electronic devices (computer and cell phone) were seized by the Toronto Police Services upon her arrest on February 9, 2021 and following a thorough investigation and a search of the Plaintiff's electronic devices by the Toronto Police Services by search warrant and finding no evidence of internet postings , the Attorney General of Ontario withdrew all the charges under the Criminal Code of Canada against the Plaintiff Ms Atas on December 7, 2021

The Toronto Police Services have conducted a thorough investigation for any internet posts related to Ms. Atas dating back to January 1, 2000 to February 9, 2021 and all criminal charges were withdrawn December 7, 2021 for no reasonable prospect of conviction

False

In an email, she warned me, “Any story in the New York Times will obviously bring out the trolls on the internet and could multiply the internet postings.”

Not a warning

False

On Thursday, Judge Corbett issued a ruling in the defamation suits, finding that Ms. Atas was responsible for what he called “unlawful acts of reprisal.” Ms. Atas, he wrote, is “apparently content to revel in ancient grievances, delighting in legal process and unending conflict because of the misery and expense it causes for her opponents.” He ordered Ms. Atas to stop.

But the judge left it up to the plaintiffs to try to get her slanderous posts taken down, even as he decried the free-for-all nature of online activity. “A situation that allows someone like Atas to carry on as she has, effectively unchecked for years, shows a lack of effective regulation that imperils order and the marketplace of ideas,” he wrote.

Corbett

Harassment and granted title to postings to the plaintiffs- furtherance of a kangaroo court

50.

**“WOMAN ACCUSED OF DEFAMING DOZENS ONLINE IS ARRESTED” ,
AND “CANADIAN WOMAN CITED IN ONLINE ATTACKS IS ARRESTED”**

51. False

Ms. Atas, 60, has waged online war against dozens of people in recent years, falsely accusing them of being scammers, thieves, sexual deviants and pedophiles. Her targets included a family that employed her 30 years ago; her mortgage lender; lawyers she had battled in court as well as those who had represented her; and the family members and colleagues of those people.

Plaintiff Ms. Atas’ electronic devices (computer and cell phone) were seized by the Toronto Police Services upon her arrest on February 9, 2021 and following a thorough investigation and a search of the Plaintiff’s electronic devices by the Toronto Police Services by search warrant and finding no evidence of internet postings , the Attorney General of Ontario withdrew all the charges under the Criminal Code of Canada against the Plaintiff Ms Atas on December 7, 2021

The Toronto Police Services have conducted a thorough investigation for any internet posts related to Ms. Atas dating back to January 1, 2000 to February 9, 2021 and all criminal charges were withdrawn December 7, 2021 for no reasonable prospect of conviction

False = depression common

False

Ms. Atas, who has told The Times that she had suffered from mental health problems in the past, did not respond to requests for comment about her arrest.

Police recently became interested in the case, said Christina Wallis, a lawyer who has been involved in litigation with Ms. Atas since 2008 and was a target of her online attacks.

The day after The Times published its article, which quoted Ms. Wallis extensively, a site called GossipBlaze.com emailed her, saying it believed that Ms. Atas had “been spamming our submission form with tens if not hundreds of posts.”

“Almost all of them are from the same IP and we figured it might be helpful to pass you this info,” the email said, referring to an internet protocol address, a unique identifier used by a computer or a computer network.

Ms. Wallis shared the email and IP address with a group of victims who had previously contacted the police. One of them, Luc Groleau, determined that the IP address most likely originated from a computer at a hotel in eastern Toronto. Mr. Groleau shared the information with a lawyer, who said he had alerted the police to Ms. Atas's whereabouts

Plaintiff Ms. Atas' electronic devices (computer and cell phone) were seized by the Toronto Police Services upon her arrest on February 9, 2021 and following a thorough investigation and a search of the Plaintiff's electronic devices by the Toronto Police Services by search warrant and finding no evidence of internet postings , the Attorney General of Ontario withdrew all the charges under the Criminal Code of Canada against the Plaintiff Ms Atas on December 7, 2021

The Toronto Police Services have conducted a thorough investigation for any internet posts related to Ms. Atas dating back to January 1, 2000 to February 9, 2021 and all criminal charges were withdrawn December 7, 2021 for no reasonable prospect of conviction

NO FINDING OF AUTHORSHIP

52. The brazenness of the actions of the sources to the New York Times story cannot be understated in their insidious plan to obtain a court order that Ms Atas is the author of internet posts after and prior to November 13, 2019 and throughout 2020 until February 8, 2021
53. Following the publication of the New York Times story “ A Vast Web of Vengeance”, on January 30, 2021, the parties to the four defamation actions who were also sources to the New York Times story surreptitiously attempted to insert into the court record in Toronto, Ontario, Canada a document consisting of 2514 pages titled
- 54.
55. The false and defamatory statements in the New York Times articles have been debunked and proven to be false by a Court Order of Justice Corbett in the Ontario Superior Court of Justice dated August 5, 2021 making no finding of authorship
56. Following the New York Times publication of “ A Vast Web of Vengeance” , on February 8, 2021 , Gary Caplan, lawyer for Defendant Dr, Joseph Caplan and others and who himself was interviewed by Kashmir Hill for the New York Times article , “ A Vast Web of Vengeance” , sought a Court Order in the Ontario Superior Court of Justice in Canada from Justice Corbett that Ms. Atas is the author of a document consisting of 2514 pages of URLs with the headline “ Schedule B List of Internet Posts Attributed to Nadire Atas “, with the URLs dated prior to November 2019 and subsequent to November 2019 and continuing all the way to January 28, 2021
57. Justice Corbett , in his August 5 , 2021 decision reporting at Caplan v. Atas, 2021 ONSC 5390 (CanLII) in Paragraph 23, made order that he makes no finding of

authorship of the internet postings contained in the 2514 pages of URLs with the headline “ Schedule B List of Internet Posts Attributed to Nadire Atas “,

58. Although Gary Caplan is not a lawyer for the Defendants Matthew Cameron , Matt Hefler , Jennifer Hefler , Michael Borysenko and Akumin Inc., Gary Caplan included URLs of postings about Matthew Cameron , Matt Hefler , Jennifer Hefler , Michael Borysenko and Akumin Inc in his document consisting of 2514 pages of URLs with the headline “ Schedule B List of Internet Posts Attributed to Nadire Atas “.

59. The New York Times article “ A Vast Web of Vengeance” referred to Matt Hefler and wrote that he had become a “ victim “ of Ms Atas in June 2020. The New York Times published this false and defamatory statement without evidence . After the publication of The New York Times article , Gary Caplan inserted Matt Hefler’s name and URLs about him into a document and tried to get a Court Order that Ms Atas is the author and it was denied.

60. The brazenness of the Defendants’ actions cannot be understated in their insidious plan to obtain Court Orders that Ms Atas is the author of internet postings after the New York Times has already published a false and defamatory article that Ms Atas is the author

ELECTRONIC DEVICES BELONGING TO MS ATAS

61. Following the New York Times publication of “ A Vast Web of Vengeance” , on February 11, 2021 , Gary Caplan, lawyer for Defendant Dr, Joseph Caplan and others and who himself was interviewed by Kashmir Hill for the New York Times article , “ A Vast Web of Vengeance” , sought an Ex-Parte Court Order in the Ontario Superior Court of

Justice from Justice Corbett for a civil search warrant to enter Ms Atas' home and seize her Electronic Devices to obtain evidence of internet postings about his clients and others

62. Gary Caplan, upon being advised that the Toronto Police Services had seized Ms Atas' electronic devices upon her arrest, Gary Caplan then sought an Order to obtain a copy of the hard drives of the electronic devices seized by and in the custody of the Toronto Police Services to obtain evidence of internet postings about his clients and others

63. The Attorney General of Ontario and Ms Atas' criminal defense lawyer challenged Justice Corbett's jurisdiction and vehemently opposed the unprecedented attempt of a civil litigant and complainant to the Criminal Code Charges to interfere with a police investigation and criminal prosecution by seizing evidence in police custody

64. Gary Caplan abandoned his motion upon being served with the factums of the Attorney General of Ontario and Ms Atas' criminal defense lawyer opposing his motion to interfere with a police investigation and criminal prosecution by seizing evidence in police custody

65. The brazenness of the Defendants' actions cannot be understated in their insidious plan to obtain Ms Atas' electronic devices on the theory that the devices contain evidence of internet postings and to prove that Ms Atas is the author of internet postings after the New York Times has already published a false and defamatory article that Ms Atas is the author

66. The victims in the Atas case live in Canada, Britain and the United States. In June 2020, Matthew Hefler, 32, the brother-in-law of a colleague of Ms. Wallis, became one of the latest targets. Mr. Hefler, who lives in Nova Scotia, is a historian who recently completed his Ph.D. in war studies. He is trying to find a teaching job. But anyone who searches for him online will encounter posts and images tarring him as a pedophile and "pervert freak." Until recently, Mr. Hefler had never heard of Ms. Atas. He had no clue why she

was attacking him. "You discover that someone you've never met, across the country, is running a one-man troll farm against you," Mr. Hefler said. "It's a nightmare scenario."

67. 2514 pages

Woman Accused of Defaming Dozens Online Is Arrested

Nadire Atas trashed the reputations of people she saw as enemies, and their relatives. On Tuesday, she was charged by the Toronto police with harassment and other offenses.

Update Jan. 25, 2022: Prosecutors in Toronto withdrew criminal charges, including charges of harassment and libel, against Nadire Atas on Dec. 7, 2021.

Nadire Atas, a Canadian woman who wrote thousands of online posts defaming her perceived enemies, was arrested on Tuesday by the police in Toronto. She was charged with crimes including harassment and libel, a Toronto police spokeswoman said.

Ms. Atas, 60, has waged online war against dozens of people in recent years, falsely accusing them of being scammers, thieves, sexual deviants and pedophiles. Her targets included a family that employed her 30 years ago; her mortgage lender; lawyers she had battled in court as well as those who had represented her; and the family members and colleagues of those people.

The arrest and charges followed [a New York Times article](#) published on Jan. 30 that detailed her campaign of harassment and defamation, illustrating the destruction that one person can wreak thanks to the hands-off postures of big tech companies like Google.

Ms. Atas was charged with 10 counts each of harassment, defamatory libel and spreading false information with the intent to alarm, said Caroline de Kloet, the police spokeswoman. “This was a lengthy, complex investigation involving numerous victims,” she said.

Last month, a Toronto judge ordered Ms. Atas to stop her online attacks against 45 people who had sued her for defamation. But posts continued to appear about the plaintiffs and their families on sites such as BadGirlReports and Cheaters.News.

Ms. Atas, who has told The Times that she had suffered from mental health problems in the past, did not respond to requests for comment about her arrest.

The targets of Ms. Atas’s attacks — including Guy Babcock, whose family employed her at its Canadian real estate office — tried for years to get law enforcement to take criminal action against her, filing police reports in the United States, Britain and Canada, where her victims lived. The criminal charges filed this week are the first Ms. Atas has faced regarding her online posts.

Police recently became interested in the case, said Christina Wallis, a lawyer who has been involved in litigation with Ms. Atas since 2008 and was a target of her online attacks.

The day after The Times published its article, which quoted Ms. Wallis extensively, a site called GossipBlaze.com emailed her, saying it believed that Ms. Atas had “been spamming our submission form with tens if not hundreds of posts.”

“Almost all of them are from the same IP and we figured it might be helpful to pass you this info,” the email said, referring to an internet protocol address, a unique identifier used by a computer or a computer network.

Ms. Wallis shared the email and IP address with a group of victims who had previously contacted the police. One of them, Luc Groleau, determined that the IP address most likely originated from a computer at a hotel in eastern Toronto. Mr. Groleau shared the information with a lawyer, who said he had alerted the police to Ms. Atas’s whereabouts.

THE DAILY - APRIL 6, 2021

Plaintiff Ms. Atas’ electronic devices (computer and cell phone) were seized by the Toronto Police Services upon her arrest on February 9, 2021 and following a thorough investigation and a search of the Plaintiff’s electronic devices by the Toronto Police Services by search warrant and finding no evidence of internet postings , the Attorney General of Ontario withdrew all the charges under the Criminal Code of Canada against the Plaintiff Ms Atas on December 7, 2021

The Toronto Police Services have conducted a thorough investigation for any internet posts related to Ms. Atas dating back to January 1, 2000 to February 9,

2021 and all criminal charges were withdrawn December 7, 2021 for no reasonable prospect of conviction

68. Kashmir Hill, the credited reporter for the New York Time articles appeared on the The Daily and defamed Nadire Atas by slander with false statements on April 6, 2021

THE DAILY - MAY 3, 2021

69. Kashmir Hill, the credited reporter for the New York Time articles appeared on the The Daily and defamed Nadire Atas by slander with false statements on May 3, 2021

Plaintiff Ms. Atas' electronic devices (computer and cell phone) were seized by the Toronto Police Services upon her arrest on February 9, 2021 and following a thorough investigation and a search of the Plaintiff's electronic devices by the Toronto Police Services by search warrant and finding no evidence of internet postings , the Attorney General of Ontario withdrew all the charges under the Criminal Code of Canada against the Plaintiff Ms Atas on December 7, 2021

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THE CURRENT WITH MATT GALLOWAY ON THE CBC IN CANADA - MAY 17, 2021

70. Kashmir Hill, the credited reporter for the New York Time articles appeared on The Current with Matt Galloway on the CBC in Canada and defamed Nadire Atas by slander with false statements on May 17, 2021

KASHMIR HILL: So she's a 60-year-old woman. She lives in the Toronto area. She grew up in Hamilton. I've talked to her, but she didn't want to tell me a lot about her life. But I was able to gather that she worked as a real estate agent in the early 90s. She was quite successful. People told me she had kind of broken through in a male-dominated industry. But then she had some troubles in her life. She lost her job in the early 90s. She had owned property, but in the early 2000s, she wasn't able to make her mortgage payments. And so it was repossessed. And she started having a lot of conflicts with people, people who had employed her, people she was in litigation against. And these conflicts escalated quite a bit.

KASHMIR HILL: It's hard to say exactly when it started. She she actually had kind of done these attacks on people pre-Internet. There was a family that had employed her. And after she lost her job there, it appears that she sent them anonymous letters in the mail after the mother in the family died, saying horrible things about her. And she sent, it seems, letters to their neighbours saying that the father in the family had been seen roaming the neighbourhood at night and masturbating. And they had thought at the time that it was Nadire Atas, but they were never able to prove it. And then, years later, she basically took these same types of attacks online. And she would write that people, they were frauds, that they were scammers, that they were thieves. And it kind of kept getting

worse and worse, calling them sexual deviants and pedophiles. And she was writing about lawyers that she was engaging litigation with, this family that employed her 30 years ago, and just writing so much about them, hundreds of posts, thousands of posts till it really just took over their Google footprints.

KASHMIR HILL: In some cases, she made her own websites, like WordPress blogs. But oftentimes, she was using these sites that exist kind of for this purpose. People have different names for them, complaint sites, gripe sites, cheater sites. There's this whole constellation of sites that just exist for people to write bad things, negative reports about other people. And the idea is, you know, if you date somebody who cheats on you, you can write about it on one of these sites. And then some future person who encounters that person will know they have this bad history. The problem is these sites are not fact-checked. There's no one making sure that what's written on these sites is true

KASHMIR HILL: In some cases, she made her own websites, like WordPress blogs. But oftentimes, she was using these sites that exist kind of for this purpose. People have different names for them, complaint sites, gripe sites, cheater sites. There's this whole constellation of sites that just exist for people to write bad things, negative reports about other people. And the idea is, you know, if you date somebody who cheats on you, you can write about it on one of these sites. And then some future person who encounters that person will know they have this bad history. The problem is these sites are not fact-checked. There's no one making sure that what's written on these sites is true

MATT GALLOWAY: How many people were being targeted? KASHMIR HILL: It is hard to say for sure. It looks like it was at least 145 people. And as I reported out the story, I started having posts written about me and my husband and my editor on the piece.

MATT GALLOWAY: So it's not just the people who are directly related to the story that you were saying about Nadire Atas, it's people who would be associated with those people? KASHMIR HILL: That's what was so troubling and striking about this story. It wasn't just the direct people that she was interacting with. There would be posts about their sisters, their brothers, their aunts, people they worked with. It was truly this kind of contagion, and it would just spread from one person to anybody she could find connected to them on... on social media or online Kashmir.

MATT GALLOWAY: Luc Groleau and Christina Wallis are victims of online harassment. Kashmir Hill has been listening in to this. Nadire Atas is now facing criminal charges. What is she charged with? KASHMIR HILL: She is charged with criminal harassment and libel. It's about these posts that she has been writing for years. MATT GALLOWAY: In the context of what we've been hearing about and what you've been describing, what's the significance of those charges? In particular? KASHMIR HILL: This was a situation where you had these people who had just been really suffering for years, not being able to do anything, they had reported this to police over the years, and no one had helped them, they were trying to solve it in the civil courts. This was a very powerful moment for them

that finally, someone in law enforcement is doing something about it. But it really is a difficult case. You know, like at the end of the day, this is a woman who's writing horrible things online. Is the solution to that jail time? And, you know, she does have mental health issues she's told the court. I talked to a relative who said she has mental illness and they've tried for years to help her. It's a difficult problem on... on many different levels. And society kind of hasn't had a good way to deal with it. MATT GALLOWAY: You've spoken with her a few times? KASHMIR HILL: I have. I spent quite a few hours on the phone with her. MATT GALLOWAY: What does she say about these posts? I mean, does she understand the impact, as we've been hearing, that the posts would have on people's lives when you call somebody a pedophile or you call somebody a fraudster, and this impacts, you know, their... their personal lives, but also their professional lives. Did she understand that? KASHMIR HILL: She denies that she authored the vast majority of these posts. She admits to, you know, basically, some early post calling Christina Wallis and other lawyers fraudsters and says, you know, that's her opinion, and she's allowed to have that opinion. She claims she didn't write the other posts. And she... she seemed to have no empathy for the victims. And she sees herself as the victim. You know, that this is destroyed her life, that she has been involved in this litigation for so many years. She's lost her homes. She's had to declare bankruptcy.

KASHMIR HILL: You know, I was somewhat prepared for this, but after I spoke to Nadire Atas several times on the phone, and she tried to dissuade me from doing the story, she said she wasn't responsible. 10/15/22, 5:01 AM February 17, 2021 Episode

Transcript | CBC Radio

<https://www.cbc.ca/radio/thecurrent/the-current-for-feb-17-2021-1.5916652/february-17-2021-episode-transcript-1.5917476> 24/25 She encouraged me to write about another case where something like this had happened. And once I made it clear to her that I was going to tell this story and that she was going to be in it, she got very angry at me. And a week after the last time I talked to her in November, these posts started appearing about me, saying that I was a plagiarist. I had slept with my boss for a year to get promoted. There were posts about my husband calling him a sex addict and a drug addict. I mean, I have a lot about me online. I have very strong Google results from all of the, you know, news stories I've written over the years. But these results actually started appearing on the first page of my results. And I was shocked. Like, I just didn't think that they'd be able to break through. Over time, they disappeared. And then Nadire Atas asked to speak to my editor, and after she talked to my editor, posts appeared about her as well.

Plaintiff Ms. Atas' electronic devices (computer and cell phone) were seized by the Toronto Police Services upon her arrest on February 9, 2021 and following a thorough investigation and a search of the Plaintiff's electronic devices by the Toronto Police Services by search warrant and finding no evidence of internet postings , the Attorney General of Ontario withdrew all the charges under the Criminal Code of Canada against the Plaintiff Ms Atas on December 7, 2021

The Toronto Police Services have conducted a thorough investigation for any internet posts related to Ms. Atas dating back to January 1, 2000 to February 9, 2021 and all criminal charges were withdrawn December 7, 2021 for no reasonable prospect of conviction

71. An unidentified reporter for the New York Times attended Ms Atas' bail hearing on April 23, 2021 and the following day emailed to the Attorney General of Ontario a link to the New York Times article

<https://www.nytimes.com/interactive/2021/04/24/technology/online-slander-websites.htm>

!

Kashmir Hill's Twitter Account A Vast Web of Vengeance

72. At 2:30 PM on Jan 30, 2021, Kashmir Hill

73. Twitter Account

I've been working on this internet horror story for months, but the people in it have been living it for more than a decade was published at URL

<https://twitter.com/kashhill/status/1355599198306103297> with a link to the



74. 2:33 PM · Jan 30, 2021 · Twitter Web App

Kashmir Hill Twitter Account

In September 2018, Guy Babcock discovered that he and his entire extended family had been branded pedophiles, scammers, thieves and sexual deviants online. When he investigated, he discovered a 25-year-old grudge was published at

<https://twitter.com/kashhill/status/1355600108663042048>

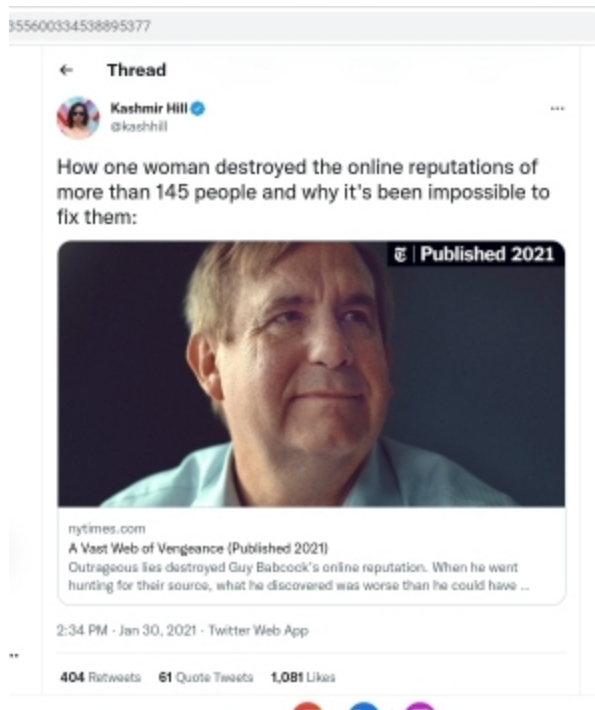


75. 2:34 PM · Jan 30, 2021 · Twitter Web App

Kashmir Hill Twitter Account

How one woman destroyed the online reputations of more than 145 people and why it's been impossible to fix them:

<https://twitter.com/kashhill/status/1355600334538895377>



76. 2:42 PM · Jan 30, 2021 · Twitter Web App

Kashmir Hill Twitter Account

The woman goes after someone's reputation online, and those of their family members, and of their colleagues. As I reported the story out, defamatory posts started appearing about me. And my husband. And my editor. <https://nytimes.com/2021/01/30/tec> was published at

<https://twitter.com/kashhill/status/1355602407082831874>



77. 2:48 PM · Jan 30, 2021 Twitter Web App

Kashmir Hill Twitter Account

Other people at @nytimes contributed to this story but we haven't named them for that reason. Published at

<https://twitter.com/kashhill/status/1355603812774502401>



78. 5:59 PM · Jan 30, 2021 · Twitter Web App

Kashmir Hill Twitter Account

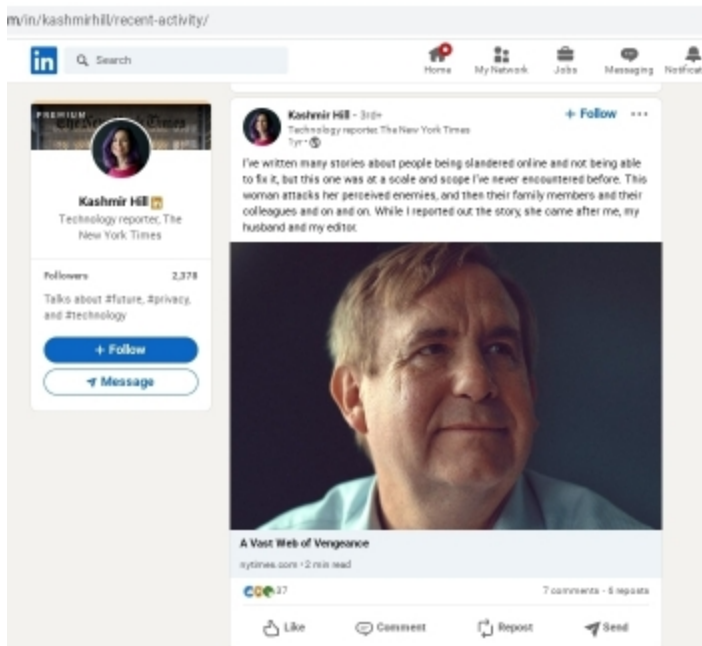
I heard "where there's smoke, there's fire" from people in the victims' orbit who had seen the search results and thought they looked ridiculous but also 'couldn't help but wonder.' was published at <https://twitter.com/kashhill/status/1355651889069760520>



79. Jan 31 2021 Kashmir Hill LinkedIn

I've written many stories about people being slandered online and not being able to fix it, but this one was at a scale and scope I've never encountered before. This woman attacks her perceived enemies, and then their family members and their colleagues and on and on. While I reported out the story, she came after me, my husband and my editor. Published at

<https://www.linkedin.com/in/kashmirhill/recent-activity/>



80. 1:25 PM · Jan 31 2021 New York Times facebook

https://m.facebook.com/story.php?story_fbid=10152592462499999&id=5281959998

Two years ago, Guy Bbacock had discovered that someone had slandered him and his family members online , calling them thieves, fraudsters and pedophiles . He investigated and discovered a grudge that went back 25 years .



81. 2:56 PM · Jan 30, 2021 · Twitter Web App

The family had been targeted by a “super-spreader” — a person who helps make and spread vicious false attacks. They were dragged into one of the worst places on the internet, where people’s character is held for ransom. <https://nyti.ms/2MCkjpe> published at

<https://twitter.com/nytimes/status/1355605736211013635>



82. 2:56 PM · Jan 30, 2021 · Twitter Web App

Many of the false posts appeared on a website called Ripoff Report, one of hundreds of “complaint sites” that let people anonymously expose an unreliable handyman, a cheating ex, a sexual predator. But there is no fact-checking, and limited accountability.

Published at [https://twitter.com/nytimes/status/1355605867924770820](\"https://twitter.com/nytimes/status/1355605867924770820\")



83. 2:57 PM · Jan 30, 2021 · Twitter Web App

While looking through his Google results, Guy Babcock recognized the photo of a commenter who had slandered him. It was a woman who had worked for his family 25 years earlier. It appeared that she was still harboring a grudge published at

<https://twitter.com/nytimes/status/1355605960530817026>



84. 2:57 PM · Jan 30, 2021 · Twitter Web App

Guy Babcock discovered that his attacker had more than 100 other victims. They had tried and failed for years to get tech companies to remove thousands of abusive posts.

<https://nyti.ms/2MCkjpe> published at

<https://twitter.com/nytimes/status/1355606062779551744>



85. 2:58 PM · Jan 30, 2021 · Twitter Web App

Some companies took down slanderous posts after our reporter

@kashhill contacted them to request comments for this article. But the false posts had already spread across a web of interconnected sites. Read more: Published at

<https://twitter.com/nytimes/status/1355606384134541313>



86. 4:09 PM · Feb 10, 2021 · Twitter Web App

The woman who trashed the online reputations of Guy Babcock and dozens of other people was arrested in Toronto yesterday: Published at

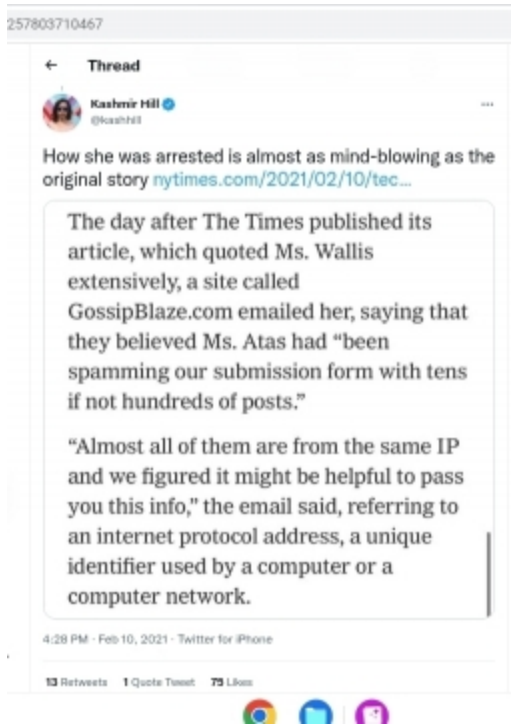
<https://twitter.com/kashhill/status/1359610413793619969?lang=en>



87. 4:28 PM · Feb 10, 2021 · Twitter for iPhone

How she was arrested is almost as mind-blowing as the original story Published at

<https://twitter.com/kashhill/status/1359615257803710467>



All is false.

Plaintiff Ms. Atas’ electronic devices (computer and cell phone) were seized by the Toronto Police Services upon her arrest on February 9, 2021 and following a thorough investigation and a search of the Plaintiff’s electronic devices by the Toronto Police Services by search warrant and finding no evidence of internet postings , the Attorney General of Ontario withdrew all the charges under the Criminal Code of Canada against the Plaintiff Ms Atas on December 7, 2021

The Toronto Police Services have conducted a thorough investigation for any internet posts related to Ms. Atas dating back to January 1, 2000 to February 9, 2021 and all criminal charges were withdrawn December 7, 2021 for no reasonable prospect of conviction

Defendants The New York Times Company d/b/a The New York Times (“The New York Times” or “The Times”), reporters Kashmir Hill, Ellen Pollock , THE DAILY PODCAST, Michael Barbaro
(Defamation, Defamation Per Se, and Defamation by Implication)

88. Ms Atas hereby repeats and re-alleges each and every allegation set forth in the preceding paragraphs as if fully set forth herein.
89. Ms Atas is a private figure who never voluntarily injected herself into any public controversy. As detailed throughout this Complaint, Defendants published false and defamatory statements pertaining to Ms Atas . Defendants published the false and defamatory statements concerning Ms Atas via an unprivileged publication to third parties; namely, his 2.4 million followers. These statements do not constitute protected legal opinions on a matter of public concern. Even if Ms Atas may be considered a limited public figure for purposes of this controversy, Defendants’ conduct constitutes actual malice toward her. . Ms Atas is informed and believes and alleges that at the time of the publication , the Defendants knew that his statements were false or acted in reckless disregard as to their falsity. Alternatively, Defendants acted negligently in failing to ascertain whether the allegations were false. Alternatively, the Defendants knew calling Ms Atas the author was false.

90. Defendants published or caused to be published false and defamatory statements which did and had the tendency to expose Ms. Atas to hatred, contempt, ridicule and/or disgrace.
91. Defendants had no applicable privilege or legal authorization to publish these false and defamatory statements or, if they did, they abused that privilege.
92. These statements are libelous because they tend to expose Ms. Atas to public contempt, ridicule, aversion or disgrace, and to induce an evil opinion of Ms. Atas in the minds of right-thinking persons, and to deprive Ms. Atas of friendly intercourse in society
93. The defamatory statements are of and concerning Ms. Atas, and reasonably understood to be about Ms Atas.
94. The defamatory statements are false.
95. Defendants published the defamatory statements knowing that they are false or with reckless disregard for the truth of the statements.
96. The defamatory statements in the constitute defamation per se because they tended to injure Ms. Atas in her trade, business or profession and directly implicated Ms. Atas in criminal activity; specifically that she was putting peoples safety at risk by threatening them.
97. In light of Ms. Atas standing in the community, the nature of the statements made about her, the extent to which those statements were circulated, and the tendency of such statements to injure someone such as Ms. Atas, the defamatory statements have directly and proximately caused Ms. Atas to suffer significant damages, including damage to her reputation, humiliation, embarrassment, mental suffering, shame and emotional distress. These damages are ongoing in nature and will continue to be suffered in the future.

98. The re-publication of the defamatory statements in other publications, as well as via the dissemination of through social media, caused Ms Atas to suffer additional damages, all of which were foreseeable to Defendants
99. Defendants' conduct was committed knowingly, intentionally, willfully, wantonly and maliciously, with the intent to harm Ms. Atas , or in blatant disregard of the substantial likelihood of causing her harm, thereby entitling Ms. Atas to an award of punitive damages.

**Defendants The New York Times Company d/b/a The New York Times ("The New York Times" or "The Times"), reporters Kashmir Hill, Ellen Pollock , THE DAILY PODCAST, Michael Barbaro
(Negligence and Gross Negligence)**

55. Ms Atas hereby repeat and re-allege each and every allegation set forth in the preceding paragraphs as if fully set forth herein.

56. Defendants was negligent in publishing

The Defendants had a duty to refrain from conduct that would cause injury to Ms Atas yet the Defendants violated that duty without hesitation.

The Defendants further assumed a duty of care when the Defendants chose to communicate with all 54 million followers on Twitter concerning Ms Atas

The Defendants violated that duty by failing to check his facts prior to publish .

The social media onslaught of hatred and bile that ensued was entirely foreseeable to the Defendants and any reasonably careful person under similar or the same circumstances as Defendants would have anticipated the mental anguish and suffering and the physical manifestation of that mental pain that would result in his conduct. Those violations were the proximate cause of the harm and great emotional pain Ms Atas suffered when she was exposed to the wrath of Defendants social media followers.

Defendant's continued participation in the publication and comments served to fire the defendants most vicious supporters. Defendants participation constitutes ongoing tortious conduct. Moreover, Defendants posts, while related to political activities, do not constitute a "political opinion" relieving Defendant of liability. Defendants' posts make factual assertions about Ms Atas , These factual allegations are clear and Defendant knew of and should have known that actions would cause harm to Ms Atas . Ms Atas' injuries were foreseeable and caused in fact by Defendants' negligence

Defendants The New York Times Company d/b/a The New York Times ("The New York Times" or "The Times"), reporters Kashmir Hill, Ellen Pollock , THE DAILY PODCAST, Michael Barbaro

(Negligent Infliction of Emotional Distress)

Ms Atas hereby repeat and re-allege each and every allegation set forth in the preceding paragraphs as if fully set forth herein.

63. Ms Atas are informed and believe and allege that Defendants' extreme and outrageous conduct intentionally or recklessly caused severe emotional distress to Ms Atas .

64. Defendant's conduct is beyond all possible bounds of decency, and is atrocious, and utterly intolerable in a civilized community. Defendants did far more than just publish a false and defamatory story . The Defendants entered into a corrupt agreement with people involved in contentious litigation with an agenda .

Defendants were well aware of the consequences of publishing false and defamatory allegations that would be picked up Google

Defendants knew the vitriol that would ensue. Defendants' conduct caused Ms Atas to suffer highly unpleasant reactions, such as fright, horror, grief, shame, humiliation, embarrassment, anger, chagrin, disappointment, worry, and nausea so severe that no reasonable person could be expected to endure it. Moreover, the Defendant's conduct unreasonably endangered Ms Atas' physical safety as evidenced by the rabid, vitriolic, and aggressive responses from social media . These responses included threats of harm, wishes of physical harm, and characterizations of Ms Atas that, if true, would endanger her physical safety. Defendant is guilty of negligently inflicting emotional distress on Ms Atas

Defendants The New York Times Company d/b/a The New York Times ("The New York Times" or "The Times"), reporters Kashmir Hill, Ellen Pollock , THE DAILY PODCAST, Michael Barbaro

(Intentional Infliction of Emotional Distress)

67. Ms Atas hereby repeat and re-allege each and every allegation set forth in the preceding paragraphs as if fully set forth herein.

68. Ms Atas is informed and believe and allege that Defendants extreme and outrageous conduct intentionally or recklessly caused severe emotional distress to Ms Atas .

69. Defendant's conduct is beyond all possible bounds of decency, and is atrocious, and utterly intolerable in a civilized community. Defendants' conduct caused Ms Atas to suffer highly unpleasant reactions, such as fright, horror, grief, shame, humiliation, embarrassment, anger, chagrin, disappointment, worry, and nausea so severe that no reasonable person could be expected to endure it.

Defendants knew the vitriol that would ensue.

70. Defendants knew this and, presumably would expect the publication to have far reaching, deep seated, catastrophic consequences in the life of Ms Atas

In spite of this, Defendants invited 54 million on social media to attack, threaten, and shame Ms Atas

Defendants s unfounded, cruel, hasty, and patently false accusations Defendants flippantly published to 54 million people who he knew or should have known would be inspired to attack Ms Atas was extreme and outrageous and caused and continues to cause severe emotional distress, anxiety, and fear to Ms Atas Moreover, the Defendant's conduct unreasonably endangered Ms Atas' physical safety as evidenced by the rabid, vitriolic, and aggressive responses from Defendants followers. These responses included threats of harm, wishes of physical harm, and characterizations of Plaintiffs that, if true, would endanger their physical safety. Defendant is guilty of intentionally inflicting emotional distress on Ms Atas

100. Defendants' conduct was committed knowingly, intentionally, willfully, wantonly and maliciously, with the intent to harm Ms. Atas , or in blatant disregard of the substantial likelihood of causing her harm, thereby entitling Ms. Atas to an award of punitive damages.

101. The Times is vicariously liable, under the doctrine of respondeat superior, for the tortious acts of its employees, officers, directors and/or agents, Kashmir Hill, Ellen Pollak , Michael Barbaro, The Daily because it authorized, supervised, directed, participated in, consented to, and/or ratified the conduct, Kashmir Hill, Ellen Pollak , Michael Barbaro, The Daily as described herein, of and/or because the conduct of Kashmir Hill, Ellen Pollak , Michael Barbaro, The Daily, as described herein, occurred within the scope of their employment with The Times.

102. In addition, the actions of The Times Defendants were willful, wanton, outrageous, motivated by spite, malice and vindictiveness towards Plaintiff, in furtherance of a fraudulent purpose, and done in conscious and deliberate disregard for Plaintiff's rights, and therefore warrant the imposition of punitive damages.

103.

Defendant Dr Todd Essig

(Defamation, Defamation Per Se, and Defamation by Implication)

104. Ms Atas hereby repeats and re-alleges each and every allegation set forth in the preceding paragraphs as if fully set forth herein.

105. Ms Atas is a private figure who never voluntarily injected herself into any public controversy. As detailed throughout this Complaint, Defendants published false and defamatory statements pertaining to Ms Atas. Defendants published the false and defamatory statements concerning Ms Atas via an unprivileged publication to third parties; namely, his 2.4 million followers. These statements do not constitute protected legal opinions on a matter of public concern. Even if Ms Atas may be considered a limited public figure for purposes of this controversy, Defendants' conduct constitutes actual malice toward her. Ms Atas is informed and believes and alleges that at the time of the publication, the Defendants knew that his statements were false or acted in reckless disregard as to their falsity. Alternatively, Defendants acted negligently in failing to ascertain whether the allegations were false. Alternatively, the Defendants knew calling Ms Atas the author was false.

106. Defendants published or caused to be published false and defamatory statements which did and had the tendency to expose Ms. Atas to hatred, contempt, ridicule and/or disgrace.

107. Defendants had no applicable privilege or legal authorization to publish these false and defamatory statements or, if they did, they abused that privilege.

108. These statements are libelous because they tend to expose Ms. Atas to public contempt, ridicule, aversion or disgrace, and to induce an evil opinion of Ms. Atas in the

minds of right-thinking persons, and to deprive Ms. Atas of friendly intercourse in society

109. The defamatory statements are of and concerning Ms. Atas, and reasonably understood to be about Ms Atas.
110. The defamatory statements are false.
111. Defendants published the defamatory statements knowing that they are false or with reckless disregard for the truth of the statements.
112. The defamatory statements in the constitute defamation per se because they tended to injure Ms. Atas in her trade, business or profession and directly implicated Ms. Atas in criminal activity; specifically that she was putting peoples safety at risk by threatening them.
113. In light of Ms. Atas standing in the community, the nature of the statements made about her, the extent to which those statements were circulated, and the tendency of such statements to injure someone such as Ms. Atas, the defamatory statements have directly and proximately caused Ms. Atas to suffer significant damages, including damage to her reputation, humiliation, embarrassment, mental suffering, shame and emotional distress. These damages are ongoing in nature and will continue to be suffered in the future.
114. The re-publication of the defamatory statements in other publications, as well as via the dissemination of through social media, caused Ms Atas to suffer additional damages, all of which were foreseeable to Defendants
115. Defendants' conduct was committed knowingly, intentionally, willfully, wantonly and maliciously, with the intent to harm Ms. Atas, or in blatant disregard of the

substantial likelihood of causing her harm, thereby entitling Ms. Atas to an award of punitive damages.

116.

Defendant Dr Todd Essig

(Negligence and Gross Negligence)

Defendant Dr Todd Essig

(Negligent Infliction of Emotional Distress)

Defendant Dr Todd Essig

(Intentional Infliction of Emotional Distress)

MS ATAS IS A PRIVATE FIGURE

117. Ms Atas is a private figure for the purposes of this defamation action, having lived her entire life outside of the public eye.

118. Ms Atas had no notoriety of any kind in the community at large.

119. Ms Atas did not, by any voluntary act, involve herself in any particular and identifiable public controversy.

120. Ms Atas did not involve herself publicly to the extent that she either assumed a role of public prominence or was in a position to influence others or the outcome of any identifiable public controversy.

121. Ms Atas has never enjoyed regular and continuing access to the media.

122. Ms Atas made no public appearances prior to the initial false accusations against her arising from the New York Times article

123. Prior to the Times' January 30, 2021 Article, Ms Atas had issued no public statements and made no media appearances.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff, Nadire Atas , demands judgment against defendants, The New York Times Company d/b/a The New York Times, Ellen Pollock, Lily Meier, Kashmir Hill , .THE DAILY PODCAST, Michael Barbaro, John Does 1 through 10, XYZ Corporations 1 through 10, jointly and severally, as follows:

- a) That judgment be entered against the Defendants for substantial compensatory damages in an amount not less than One Hundred Million Dollars (\$100,000,000.00);
- b) Punitive damages in the amount of Four Hundred Million Dollars (\$400,000,000.00;)
- c) All taxable litigation costs, pre-judgment interest, and post-judgment interest; and
- d)For an award of interest, costs, expenses and attorneys' fees pursuant to statute; and

e) For such other relief as this Court may deem fair, equitable and just.

DEMAND FOR JURY TRIAL

Plaintiff hereby demands a trial by jury as to all issues so triable.

Dated: December 14, 2022

Respectfully Submitted

Nadire Atas
411- 11 Thorncliffe Park Dr
Toronto, ON M4H 1P3